

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION
OF THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

MASTER DOCKET

18-md-2865 (LAK)

This document relates to:

18-cv-04434; 18-cv-07824; 18-cv-07827;
18-cv-07828; 18-cv-07829; 19-cv-01781;
19-cv-01783; 19-cv-01785; 19-cv-01788;
19-cv-01791; 19-cv-01792; 19-cv-01794;
19-cv-01798; 19-cv-01800; 19-cv-01801;
19-cv-01803; 19-cv-01806; 19-cv-01808;
19-cv-01809; 19-cv-01810; 19-cv-01812;
19-cv-01813; 19-cv-01815; 19-cv-01818;
19-cv-01866; 19-cv-01867; 19-cv-01868;
19-cv-01869; 19-cv-01870; 19-cv-01871;
19-cv-01873; 19-cv-01894; 19-cv-01896;
19-cv-01918; 19-cv-01922; 19-cv-01926;
19-cv-01928; 19-cv-01929; 19-cv-01931;
21-cv-05339.

**DECLARATION OF MARC A. WEINSTEIN IN SUPPORT OF PLAINTIFF
SKATTEFORVALTNINGEN'S OPPOSITION TO DEFENDANT'S MOTION FOR
SEPARATE TRIALS**

I, Marc A. Weinstein, an attorney duly admitted to practice law before the courts of the State of New York, hereby declare under penalty of perjury:

1. I am a partner at Hughes Hubbard & Reed LLP, counsel for Plaintiff Skatteforvaltningen ("SKAT") in these actions. I am fully familiar with the matters set forth in this declaration.

2. I submit this declaration in support of SKAT's Opposition to Defendant Michael Ben-Jacob's Motion for Separate Trials.

3. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of March 28, 2024 conference in *In re Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Tax Refund Scheme Litigation*, 18-md-2865 (LAK) (S.D.N.Y. Mar. 28, 2024).

4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the transcript of the deposition of Michael Ben-Jacob, dated October 11, 2021 (Vol. 1).

5. Attached hereto as Exhibit 3 is a true and correct copy of the Bates-stamped document JHVM_0009136, produced by the van Merkensteijn Defendants in this litigation.

6. Attached hereto as Exhibit 4 is a true and correct copy of the Bates-stamped document JHVM_0010571, produced by the van Merkensteijn Defendants in this litigation.

7. Attached hereto as Exhibit 5 is a true and correct copy of the Bates-stamped document WH_MDL_00219734, produced by the Markowitz Defendants in this litigation.

8. Attached hereto as Exhibit 6 is a true and correct copy of the Bates-stamped document WH_MDL_00342578, produced by the Markowitz Defendants in this litigation.

I, MARC A. WEINSTEIN, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
May 31, 2024

/s/ Marc A. Weinstein
Marc A. Weinstein